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Attorneys for Defendant CME INTERNATIONAL LLC

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

BARBARA HARRISON, an individual,

Plaintiff,

v.

CME INTERNATIONAL LLC (dba Bob's
watches),

Defendant.

CASE NO.: 8:23-cv-00347-CJC-KES

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

[Fed.R.Civ.P. 12(1) and (6)]

Date: May 22, 2023

Time: 1:30 p.m

Courtroom: 9B

Ronald Reagan Federal Building and United
States Courthouse

Hon. Cormac J. Carney

1 Defendant CME International, LLC hereby requests that this Court take judicial
2 notice of the following:

3 1. The landing page of Defendant's website, www.bobswatches.com, a true and
4 correct copy of which is attached hereto as Exhibit 1, which shows the location information
5 of Defendant's physical location and specifically states that visits to Defendant's physical
6 location in Newport Beach, CA is by appointment only.

7 2. The accessibility page of Defendant's website,
8 <https://www.bobswatches.com/accessibility-help>, a true and correct copy of which is
9 attached hereto as Exhibit 2, which provides ADA-compliant tools to assist those with
10 visual impairments.

11 Respectfully Submitted,

12 STILLMAN & ASSOCIATES

13 

14 April 22, 2023

15 By:

16 Philip H. Stillman, Esq.
17 Attorneys for Defendant
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PROOF OF SERVICE

I, the undersigned, certify under penalty of perjury that on April 23, 2023 or as soon as possible thereafter, copies of the foregoing Notice of Motion to Dismiss, Memorandum of Points and Authorities, Request for Judicial Notice and Proposed Order were served electronically by ECF.

By: /s/ Philip H. Stillman
For Defendant

The Pre-Owned Rolex Exchange

Buy Rolex Sell Rolex



SHOP

Rolex Watches

Rolex Submariner

Rolex Datejust

Rolex GMT-Master

Rolex Daytona

Rolex Explorer

Rolex Women's

EXPLORE

Popular Models

Rolex President

Rolex Yacht-Master

Rolex Sea-Dweller

Rolex Vintage

Rolex Milgauss

Rolex Air-King

Rolex Sky-Dweller

Rolex Day-Date

Rolex Datejust II

Rolex Date

Rolex Explorer II

Rolex GMT-Master II

Rolex Cellini

Rolex Yacht-Master II

Rolex Day-Date II

Rolex Oyster Perpetual

SHOP ALL MODELS

SELL

Your Luxury Watch

If you are looking for the best place to sell your Rolex or how to find the value or worth of your used Rolex watch, turn to the experts here for a free no obligation evaluation.

Email Address

Rolex

GET YOUR VALUE

New Arrivals

UPDATED HOURLY

Rolex Datejust
\$14,495

Rolex Datejust
\$7,995

Rolex Datejust
\$16,495

Rolex Datejust
\$9,995

Rolex Datejust
\$10,595

Rolex Day-Date
\$21,495

SHOP MORE WATCHES

Editorial Daily Articles

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2023 Reactions to Top Watches & Wonders Releases

Rolex News

Watches & Wonders Top Brand Releases and Popular Trends

Rolex News

Rolex Watches & Wonders Biggest Releases & Discontinued Models

Rolex News

Watches & Wonders Geneva 2023: Rolex, Tudor, Patek & More Brands Revealed

Buying Guides

Omega Ploprof Ultimate Buying Guide

Buying Guides

Rolex Valentine's Day Buying Guide

Our Promise

TRUST | HONESTY | TRANSPARENCY

100% Authentic
All watches are 100% Authentic

Full Transparency
We publish the buy and sell prices for all watches to honor the fair market value of all products.

Real Time Inventory
Every watch on our website is in stock and ready for sale. Including hourly New Arrivals.

Free Shipping
Enjoy fast, free overnight shipping on all orders.

ABOUT

Bob's Watches

Our Story

Founded in 1999, Bob's Watches is the leading online marketplace for buying, selling and trading used Rolex watches for men and women. With over 20 years of experience, and thousands of satisfied customers, we carry the world's largest selection of Rolex watches for sale as well as other top brands.

Our pre-owned luxury watch exchange is known for providing excellent customer service and offering the best prices through our low-price guarantee. All watches listed on our site are in stock and immediately available for free overnight shipping. Our selection is meticulously inspected and authenticated by third-party experts, ensuring every luxury watch listed on our store is 100% certified authentic.

Located in Newport Beach, California, we are proud members of the BBB, the IWJG, Jewelers Board of Trade and the Chamber of Commerce.

Along with a wide selection of new and used models for purchase, Bob's Watches is the most trusted destination to sell vintage and contemporary watches at full market value. Our Rolex serial numbers chart look-up tool helps owners learn when a specific piece was manufactured, and by filling out and submitting the form on our Sell Rolex page, viewers can get exact estimations on models in question. In addition, our YouTube video helps visitors learn "How to spot a fake Rolex."

Popular Models:

- Rolex Submariner
- Rolex Datejust
- Rolex Daytona
- Rolex GMT Master II

Trust, honesty, and transparent pricing. Bob's Watches offers the largest and finest selection of used, pre-owned, and vintage luxury watches. It has become the ultimate destination for consumers looking to buy, sell, or trade certified pre-owned timepieces, attaining a BBB A+ rating, and has been quoted and featured in many of the world's leading news publications.

PAUL ALTIERI

Founder and CEO | Bob's Watches

About Bob's Watches

Copy link

“

THE REVIEWS

What People Are Saying

★★★★★

Always professional, very informative and 100% legitimate. Highly recommended. And trust me, I did my homework on secondary sellers.

SKIP S.
Houston

★★★★★

Just wonderful. Well priced watches in great condition. I also don't remember the last time I enjoyed speaking to customer service as much as I did... almost didn't want to hang up!

CARLO L.
Dallas

★★★★★

Amazing customer service!! I sent an email inquiring about a piece and was quickly contacted by a representative who helped me out. Overnight shipping and 3 days to checkout the watch or return it for no cost. No better place to pick up a watch. 10/10!!

CODY W.
Los Angeles

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Why Shop at Bob's?

Trust, honesty, and transparent pricing. The Company offers the largest and finest selection of used, pre-owned, and vintage luxury watches from brands including Rolex, OMEGA, Patek Philippe, Panerai, and more. It has become the ultimate destination for consumers looking to buy, sell, or trade certified pre-owned timepieces, attaining a BBB A+ rating, 5/5 stars in Ekomi, and has been quoted and featured in many of the world's leading news publications.

Unlike competitors, all watches are in stock ready for immediate overnight shipping. Visit our resources page to learn more about the Company and its rich history. All watches are restored using established authorized repair shops using genuine parts.

Price and Authenticity Guarantee

Our online collection of pre-owned timepieces offer a wide selection for those with a broad range of budgets and lifestyles. Our catalog is vast but singular in quality and affordability.

Bob's strenuous process ensures the highest quality of used luxury watches. By focusing on luxury and integrity, our in-house experts can help pinpoint our customers' exact specifications of our customers and guide them towards a piece that perfectly balances style, sophistication, and timeliness. The rest is up to the onlookers. The Company consistently ranks as the "best place to buy a Rolex watch".

We pride ourselves on buying and selling nothing but genuine, 100% authentic timepieces. Our in-house experts check and certify the authenticity of each and every piece so that customers are guaranteed to purchase a 100% real and genuine product.

To best accommodate our clients we go to great lengths to ensure we curate a selection that falls within their budget, while still focusing on pieces that can truly enhance a lifestyle. We strive to help each client find what they are looking for. From two-tone Datejust watches to gold Date Date timepieces, we keep a large inventory on hand to ensure the best possible selection.

Vintage and Contemporary Watch Collection

As the most trusted name in luxury watches, with the largest inventory on-hand and ready for immediate sale, Bob's Watches is the foremost destination to find the best in authentic, pre-owned luxury accessories. So whether on the hunt for a new pre-owned Ceramic No Date Submariner, a , or a vintage Paul Newman Daytona, Bob's is your primary source to find the best-of-the-best in pre-owned luxury goods at unbeatable prices. We offer the full line of Rolex models in stainless, solid gold, and two tone. The esteemed still sees considerable demand today from enthusiast and non-enthusiasts alike due to its powerful design and identifying features of its 3-register chronograph dial.

We have an ever-evolving selection of men and women's models, with some representing modern timepiece aesthetics, and others bearing more spirited vintage design ethos - a category that has increased quite significantly in terms of value and popularity over the last several years.

Why Do We Specialize In Rolex Watches?

The brand is synonymous with style, elegance, and sophistication. From its humble beginnings in London in 1905, to becoming one of the most revered brand names in the world, the Company has and will always remain in the upper echelon of luxury timepieces.

Wearing one of these beautifully-designed wristwatches exudes a certain kind of style and grace unmatched in the watchmaking industry. Few other brand names are enamored on such a broad scope, or so universally treasured on such an international scale.

Sell your Rolex Watch

Whether you are looking to buy, trade, or sell a Rolex watch, you can always count on us to provide the best prices and the best service. Our team of experts are professionals in their field and will thoroughly examine your watch to arrive at the most current fair market valuation. We offer this level of service on all brands, but this brand is our specialty.

In the past 12 years, we have purchased more used, pre-owned and vintage watches than anyone in the industry. And we understand that selling your timepiece can be a daunting experience so to that end we offer same-day immediate payment by check or wire, and your watch is insured from the second it leaves your possession.

Your trust is of paramount importance. We are the only retailer that offers transparent prices allowing our marketplace to serve as a "Kelly Blue Book" for used Rolex watches. Values and prices have significantly increased the past 5 years so it's important to sell your watch to a buyer that is dedicated to the brand and is up to date on current values. We guarantee the best buy prices and can get you a firm quote in less than 1 day.

The Panerai Collection

If you are searching for a nice blend of Italian design and Swiss technology, you might want to take a closer look at our used Panerai selection. Founded in 1860 in Florence, Italy this brand manufactures a selection of elegantly crafted timepieces.

Bob's Watches In The News

The Company has been featured in many of the world's largest and most respected news publications including but not limited to The Wall Street Journal, The NY Times, CNBC, Fox News, Barrons, Forbes, Fortune Magazine, The Los Angeles Times, Time Magazine, TechCrunch, Business Insider, JCK, and more.

The Company was recently ranked #129 of the fastest-growing private companies in America by INC 500 and The Internet Retailer Hot 100. Our founder & CEO Paul Altieri has been featured and interviewed by dozens of fashion and watch journalists over the years for his insight and knowledge and is widely considered one of the foremost experts on Rolex watches. Visit our press page to learn more.

Shop our online catalog of pre-owned luxury watches from popular brands such as: Rolex, OMEGA, Tudor, Breitling, Panerai, Patek Philippe, Cartier, Audemars Piguet, Oris, and more.

Accessibility Help

Bob's Watches is committed to making sites accessible for all, including people with disabilities. We are continuously improving the service we provide through our app to comply with increased accessibility standards, guidelines, and to make the browsing experience better for everyone.

ACCESSIBLY APP TOOLBAR

Conformance status

The app uses the Web Content Accessibility Guidelines (WCAG) defined requirements to improve accessibility for people with disabilities. It defines three levels of conformance: Level A, Level AA, and Level AAA. Accessibly App is following the best guidelines and is partially conformant with WCAG 2.0 level AA.

Accessiby App features

When a site has Accessibly App installed, the website can be adjusted with keyboard navigation using the "tab" key (WCAG 2.1/2.1.1). Additionally, see the list of all provided Accessibly App features and tools for better website experience:

Zoom | WCAG 2.1 / 1.4.4

This feature enables users to enhance the size of the text to up to three times the original text for better text readability.

Bigger cursor

Makes the cursor bigger and more prominent. Increases the size for better site browsing.

Invert colors

Invert the colors of the website content. For those with decreased vision, the high contrast greatly helps to read the site better.

Tweak Contrast | WCAG 2.1 / 1.4.6

This feature lets users manually select from two options: to enhance the contrast of the website or to decrease the contrast.

Tweak Brightness | WCAG 2.1 / 1.4.6

This feature lets users update the brightness on the site. The content can either be made brighter or darker.

Grayscale | WCAG 2.1 / 1.4.6

Users can turn on grayscale, making the website content appear only in shades of gray. This benefits people with visual impairment.

Reading Line

Add a supportive reading line to the site.

Readable fonts

Convert the fonts available on-site to one of the most easily readable fonts: Helvetica.

Alt Text and Images

Ability to read alt text of images. As of now, our tool has added a feature where alt descriptions for images without them are generated using Google's Vision AI. In the event that you haven't manually written these image descriptions yourself, this greatly helps people with visual impairment browse your site.

Tooltips | WCAG 2.1 / 2.5.3

Add labels to images that contain a written description of the image.

Highlight links

Highlight links to make them more prominent.

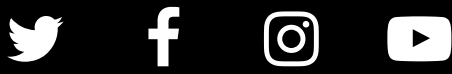
Hide images

Hide images on the site. This provides better site readability for people with visual impairment.

Read page

A feature that allows a voice to read the text on your site out loud to visitors.

We strive to have websites that are accessible to individuals with disabilities. However, if you encounter any difficulty in using our site, please [email us](#) for assistance with accessibility issues.



1900 Quail St Newport Beach, CA 92660

By Appointment Only MON - FRI 9AM - 5PM (PST)

Have a Question? [\(800\) 494-3708](tel:8004943708)

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Our Company

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- How We Give Back
- Press
- Trusted Partners
- Bob's Watches Wikipedia
- Scholarship

Services & Support

- Seller Terms & Conditions
- Consignor Terms
- Contact Us
- FAQ
- Accessibility

Buying & Selling

- Why Buy From Us
- Authenticity Pledge
- Buyers Protection Plan
- Bob's Rolex USA
- Testimonial Reviews

Shipping & Returns

- U.S. Shipping
- International Shipping
- Returns
- Warranty

